

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CYRANO, INC.,

Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,
QUOTIUM TECHNOLOGIES, S.A., and
TECHNOLOGIES, S.A.,

Defendants.

CIVIL ACTION NO. 05-CV-11558-DPW

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE MEMORANDUM IN EXCESS OF PAGE LIMIT**

The Plaintiff, Cyrano, Inc. ("Cyrano"), hereby seeks leave of the Court to file a memorandum in excess of the page limit imposed by Rule 7.1(B)(4) of the Local Rules of the United States District Court for the District of Massachusetts. Cyrano seeks this waiver of the page limitation in connection with its Memorandum in Support of Motion for Preliminary Injunction.

This action is related to numerous other actions and appeals, both here and in France, spanning a four-year period. In addition to the complex issues raised in the Complaint in this action, Cyrano's motion for a preliminary injunction involves complicated procedural and substantive issues of law. Cyrano requires excess pages to sufficiently address how the Defendants' recent conduct is distinguished from a default in one of the related actions, while addressing the effect of a recent French judgment that determined the ownership rights to the intellectual property at issue here. These factors have necessitated a memorandum in excess of twenty pages.

WHEREFORE, Cyrano respectfully requests that this Court grant leave to exceed the twenty page limit set forth in Local Rule 7.1(B)(4).

Respectfully submitted,

Plaintiff,
CYRANO, INC.,
By its attorneys,

/s/ Stephen Y. Chow
Stephen Y. Chow, BBO #082990
Michael K. Sugrue, BBO #655878
BURNS & LEVINSON LLP
125 Summer Street
Boston, Massachusetts 02110
(617) 345-3000

Dated: June 20, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I hereby certify that on June 20, 2006, I conferred by telephone with Mayeti Gametchu, Esq., counsel of record for the Defendants, in a good faith attempt to resolve or narrow the issues, but was unable to do so.

/s/ Michael K. Sugrue
Michael K. Sugrue

CERTIFICATE OF SERVICE

I, Michael K. Sugrue, hereby certify that a true copy of the foregoing Motion for Leave to File Memorandum in Excess of Page Limit was served upon the following counsel by regular mail on this the 20th day of June, 2006:

Kevin J. O'Connor, Esq.
Mayeti Gametchu, Esq.
Paragon Law Group LLP
184 High Street
Boston, MA 02110

/s/ Michael K. Sugrue
Michael K. Sugrue